UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

April 30, 2010

Cecilia R. Seesholtz
Forest Supervisor
Boise National Forest
1249 South Vinnell Way
Boise, Idaho 83709

Re: EPA Region 10 Comments on the Draft Environmental Impact Statement for the Clear Prong Project (EPA Project# 09-060-AFS)

Dear Ms. Seesholtz:

We have reviewed the draft environmental impact statement (EIS) for the proposed Clear Prong Project (CEQ No. 20100082) on the Cascade Ranger District of the Boise National Forest, Valley County, Idaho. Our review was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Section 309 specifically directs the U.S. Environmental Protection Agency (EPA) to review and comment in writing on the environmental impacts associated with all major federal actions. Under our Section 309 authority, our review of the EIS prepared for the proposed project will consider the expected environmental impacts, and the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

The draft EIS analyzes two alternatives: a no action alternative (Alternative A) and the proposed action (Alternative B). Alternative B proposes to implement silvicultural activities, including thinning of sub-merchantable trees, prescribed fire, and aspen enhancement. An estimated 9.5 million board feet (mmbf) of wood products would be removed from within the 11,056 acre project area. Road-related activities would include the construction of 1.1 miles of temporary road, the improvement of 0.8 miles of road, the removal of 12 undersized culverts, and the decommissioning of 4.4 miles of road.

We commend the Forest Service for the high quality of this DEIS. The document is clear, well organized, and provides a thorough analysis of resources affected by the proposed project. Based on our analysis, we have assigned a rating of LO (Lack of Objection) to the draft EIS. This rating and a summary of our comments will be published in the Federal Register. A summary of the rating system we used in conducting our review of the DEIS can be viewed at http://www.epa.gov/compliance/nepa/ comments/ratings.html.

Although we are registering no objections to the proposed analysis, we do offer the following suggestions that we feel would further strengthen the document at the Final EIS stage:

1) *Replanting Plans*. The document indicates on page S-9 (table S-1) that 358 acres would be planted post harvest. It is not clear however, where that planting would occur, or what the overall objectives for that planting would be. We raise this question within the context of the accruing body of science linking replanting with increased future fire severity[1,2]. We encourage the Forest Service to give additional consideration to where and how planting is conducted, and how future fire risk might be mitigated through planting design.

2) *Sediment reduction activities.* The DEIS indicates on page 3-88 that *BOISED* reflects a temporary and near term increase in sedimentation, but also notes that this modeled output does not reflect the benefits of project design features incorporated into Alternative B. Because sediment is a key water quality concern within the watershed, these project design features are of key importance. We recommend that the FEIS provide additional detail regarding the erosion control design features referenced in section 2.4.2.5.

Thank you for the opportunity to review this draft EIS. If you would like to discuss the content of this letter, please contact Teresa Kubo of my staff at, (503) 326-2859 or feel free to contact me at, (206) 553-1601.

Sincerely,

Christine B. Reichgott

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

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[1] Odion DC, Frost E, Strittholt JR, Jiang H, DellaSala DA, Morizt MA. 2004. Patterns of fire severity and forest conditions in the western Klamath Mountains, California. Conservation Biology 18: 927-936.

[2] Thompson, Jonathan R., Spies, Thomas A., Ganio, Lisa M. 2007. Reburn severity in managed and unmanaged vegetation in a large wildfire. PNAS 104: 10743-10748; published online before print as 10.1073/pnas.0700229104